

NORTH LONDON WASTE AUTHORITY

REPORT TITLE: SERVICES UPDATE

REPORT OF: HEAD OF STRATEGY AND SERVICES

FOR SUBMISSION TO: AUTHORITY MEETING

DATE: 2ND DECEMBER 2019

SUMMARY OF REPORT:

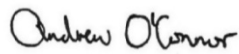
This report informs Members about the latest operational activities and associated issues dealt with by the operations team of the Authority.

RECOMMENDATIONS:

The Authority is recommended to:

1. Note performance on service delivery in the current year
2. Agree to phase out the Kerbside collection of Waste Electronic and Electrical Equipment (WEEE) by the incumbent contractor and work with Boroughs and local charities to deliver the service as detailed in paragraph 8.2 and Annex 1 of this report.
3. Agree that NLWA officers should liaise with borough opposite numbers, and engage with charities on the Recycling Credit Scheme and present a recommendation to the February Authority meeting on whether to continue offering credits in 2020-21 (paragraph 10.1 and Annex 2).

SIGNED:



... **Head of Strategy and Services**

DATE: 20th November 2019

1. BACKGROUND

1.1. This report provides Members with an update of the main operational matters that have arisen since the last Authority meeting in October 2019 as well as the latest available validated tonnage information from municipal waste collected by the seven London boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. The North London Waste Authority (NLWA) has a statutory responsibility for providing municipal waste disposal services for the seven constituent borough councils and powers to arrange for the reuse, recycling and composting of municipal waste.

2. OVERVIEW

2.1. In the first six months of the year 2019/2020 (to end September) compared to the same period last year household waste arisings are 1.4% higher although non-household waste has decreased. The net effect is a 0.5% increase in residual waste up to the end of September.

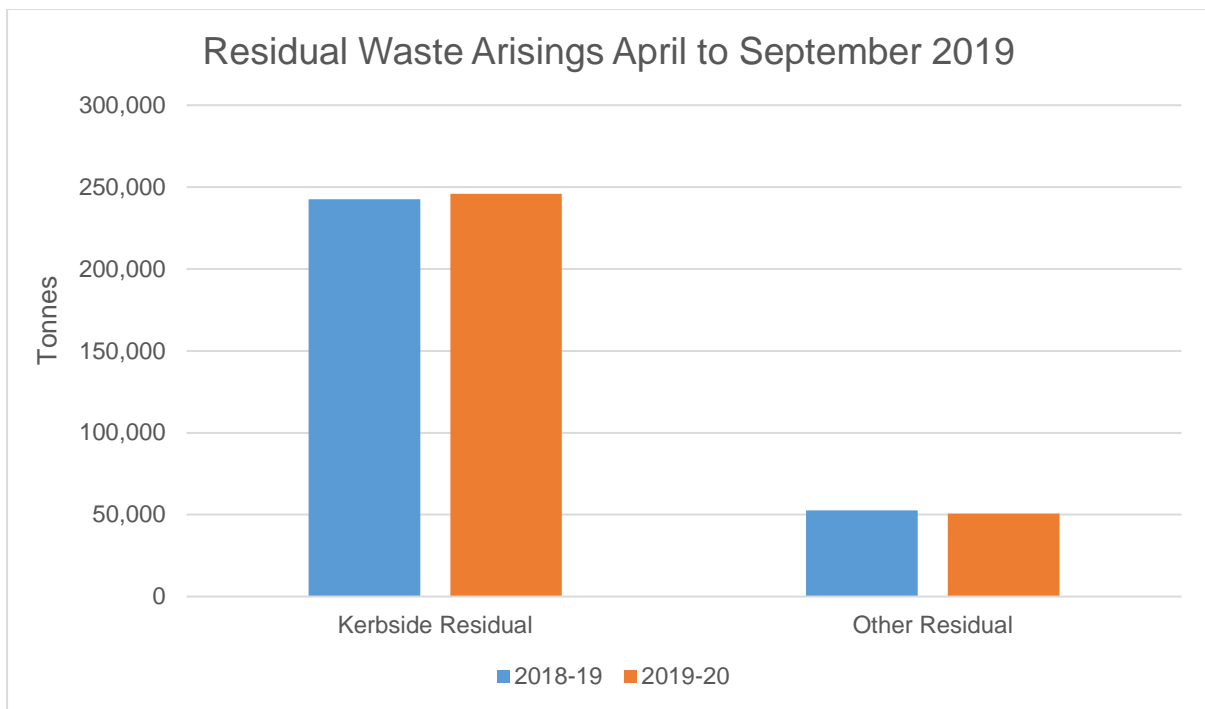


Figure 1: Residual Waste Arisings comparison April to September 2018/19 -2019/20

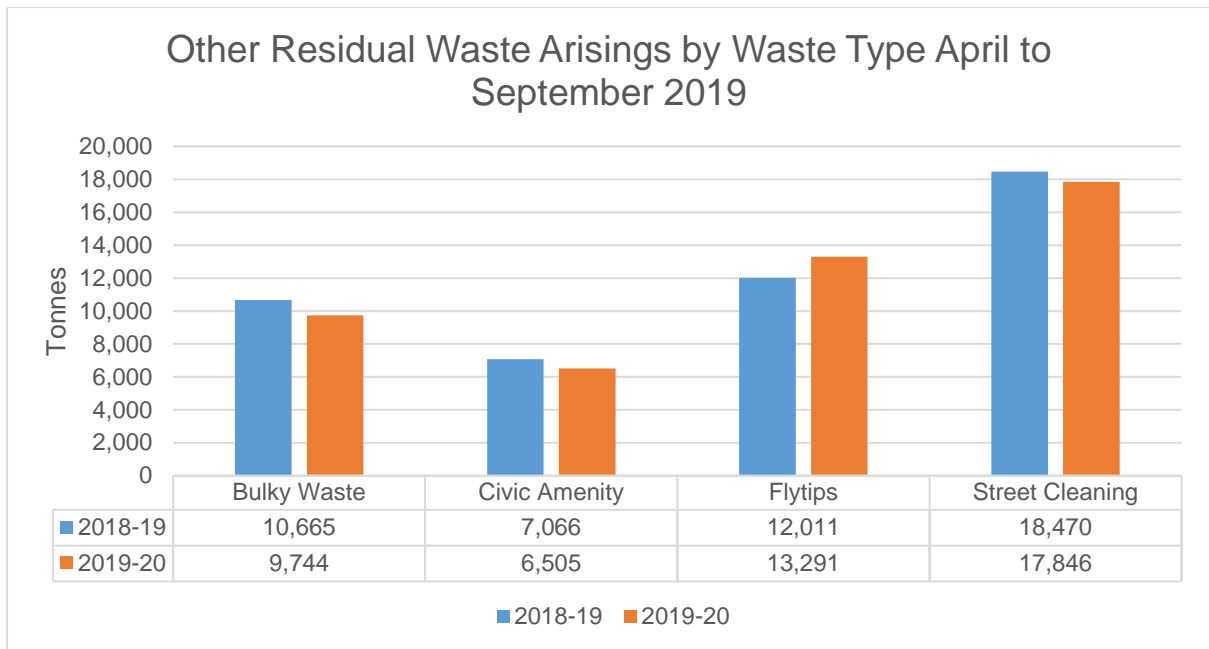


Figure 2: Other Residual Waste Arisings comparison April to September 2018/19 -2019/20

- 2.2. Figure 2 represents the other residual waste streams collected. Tonnages continue to decline including bulky and civic amenity waste. Flytip volumes have increased, and the Authority will continue to monitor this in liaison with Borough officers.
- 2.3. Mixed dry recyclate volumes have increased by 2% this year April-September when compared to the same period last year as illustrated in Figure 3. However, contamination is increasing across the Boroughs. The Authority is seeing a rise in contaminated material at Hornsey St and Hendon in addition to material delivered directly to BIFFA and Bywaters. Officers are feeding back to Borough officers daily the number of rejected loads and meetings are taking place to tackle this problem.

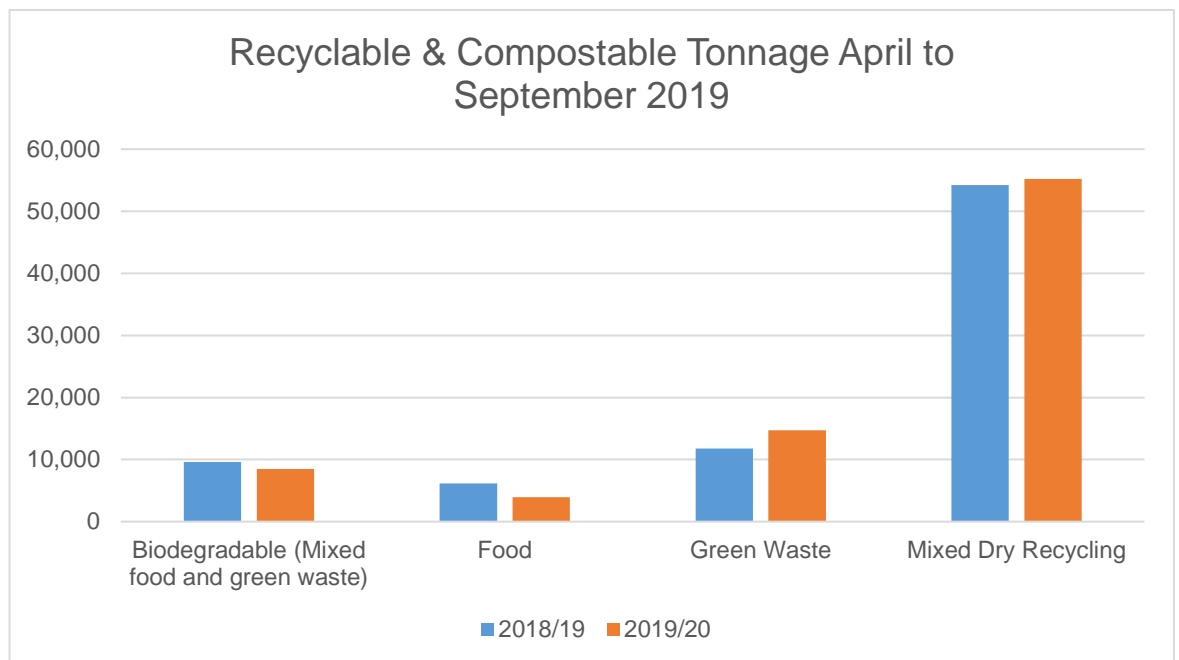


Figure 3: Recyclable and Compostable tonnage April to September 2018/19 -2019/20

- 2.4. There has been a reduction in the volume of organics collected by 9.5%. Food tonnages have decreased and would be attributable to Barnet suspending the collection service last year. However, food waste tonnages have increased across the other Boroughs.

3. REUSE AND RECYCLING CENTRES

The tonnages at the Reuse and Recycling Centres (RRC) continue to decline from 2018/19 to 2019/20 as illustrated in Figure 3. The volumes of DIY waste are in decline (wood, plasterboard and rubble). In financial terms this represents a saving of just under £50,000 to the Authority compared to the budget for these streams. There is an additional saving on residual waste disposal and transport from the RRC's of £45,000.

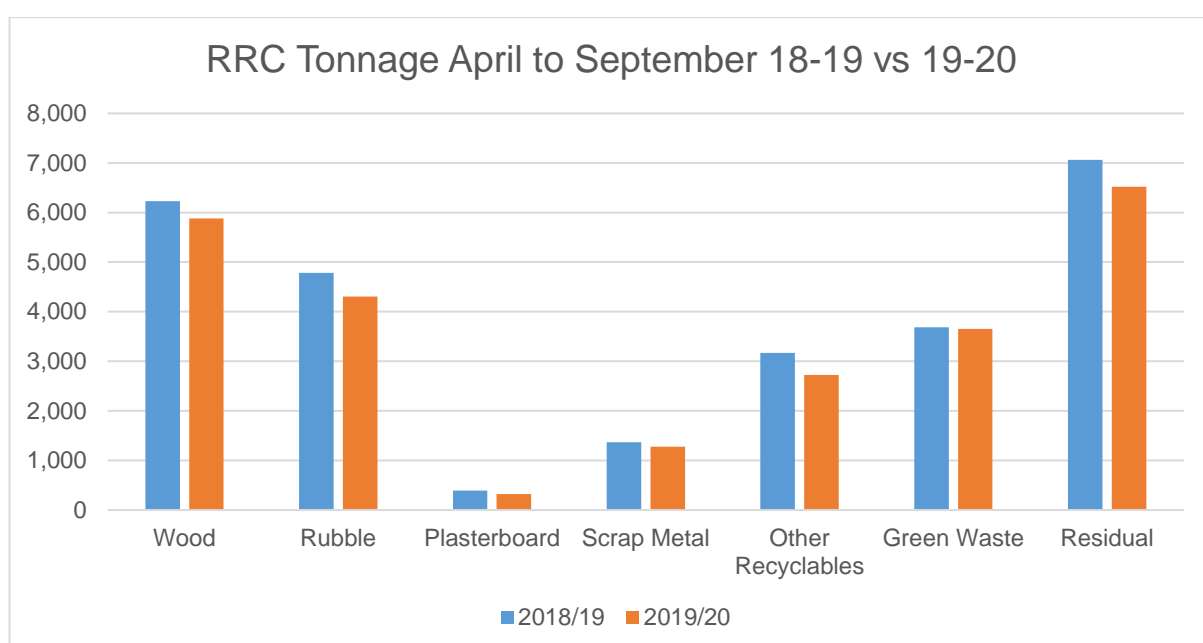


Figure 4: Comparison Waste Arisings at the RRC April to September 2018/19 -2019/20

4. FLEET OPERATORS RECOGNITION SCHEME (FORS)

- 4.1. LondonEnergy Ltd (LEL) are working on their gold accreditation and plan to submit their application before Christmas.

5. GERON WAY TRANSFER STATION

- 5.1. The design of the Geron Way transfer station has now been approved by officers and LEL with the design team of Regional Enterprise, a joint venture between Capita Plc and London Borough of Barnet. The Authority was advised that the expected opening day for the new facility will be at the end of 2021 rather than 2020. Our and LEL's financial forecasting is based on this new date.
- 5.2. From 10 November Barnet have had to suspend the green waste collection service to accommodate urgent maintenance work at the Oakleigh Road Depot. Collections

will resume in February. Officers are liaising with Barnet and LEL in managing this period and minimising disruption.

6. MERIDIAN WAY

- 6.1. The Authority continues to monitor the impact of the roadworks on Meridian Way, in case of disruption to borough service vehicles and is considering contingency options bearing in mind the impending Christmas period.

7. COMMODITY PRICES

- 7.1. The chart below provides the latest market information, and shows commodity prices between May and October 2019, taken from LetsRecycle.com

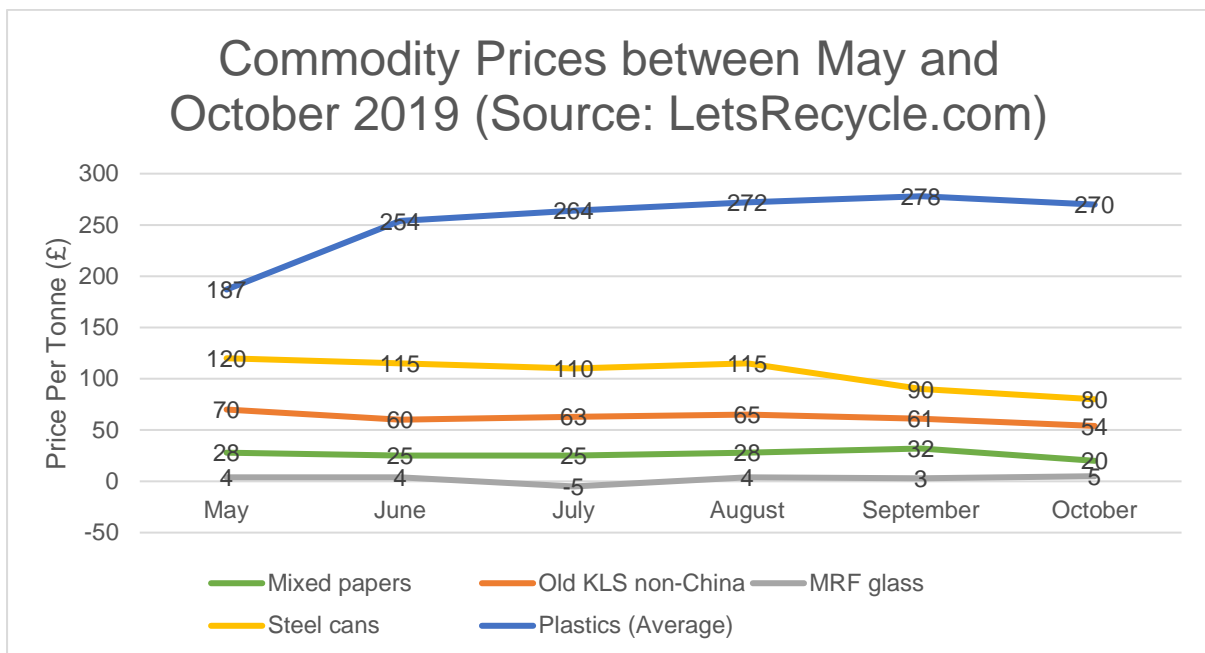


Figure 4: Commodity Prices March -October2019

- 7.2. Since August, prices of Steel Cans and Old KLS (used cardboard) non-China have been steadily falling. Mixed Papers had a slight rise in September but are now at their lowest price for the last 6 months. Used cardboard prices are expected to continue to fall and remain low throughout this winter. However, there is hope that new processing plants opening in 2020 will increase demand for this product, including facilities in Europe and Malaysia, and companies in China looking to shift production abroad following the Chinese government's recent restrictions on imports of recyclables.

<https://www.letsrecycle.com/news/latest-news/cardboard-down-crisis-says-bir-chief/>

- 7.3. The new Materials Recycling Facility (MRF) contract which comes into effect in mid-December 2019 includes an 80:20 split on commodity income between the Authority and our contractors, increasing the Authority share from 50:50 in the current contract. The overall increase in risk means that the Authority is more exposed to market volatility and uncertainty; therefore, changes to commodity values will have a greater impact on the Authority during this new contract. In the

longer term, if commodity prices return to those seen in prior years, this could positively impact on Authority finances. In addition, bidders had made clear in market testing that they would have included a significant risk premium in their bids if the Authority had required them to take a higher share of variations

8. WASTE ELECTRICAL AND ELECTRONIC EQUIPMENT SERVICES

- 8.1. Members approved in October 2018 to trial the option of the kerbside collection service run by Clearabee to collect WEEE from residents at an annual cost of £80,000 per annum. This included a service offering of 20 collections per day across the seven Boroughs for one year. This service was to be promoted and monitored to enable an informed decision to be made as to the continuation of the collection service. Further details are provided in Annex 1 of how the service has performed over the last year.
- 8.2. Officers recommend not to continue the service with Clearabee, instead to work with Boroughs to promote their additional services and also to work with charities such as Brightsparks. There is a case for continuing the service to end-March (subject to contractors' consent) to facilitate a smooth transition.

9. MRF CONTRACT

- 9.1. The Authority has started mobilising the contracts with both Biffa and Bywaters as the contracts start on 16 December. Meetings have occurred monthly with the contractors.
- 9.2. The Authority is working with Officers in boroughs to ensure there is a shared understanding of how the contracts will work and how it will affect individual boroughs. The contracts include new reporting and monitoring requirements which will provide additional data to enable contamination causes to be identified and costs itemised. Further discussion will take place with Borough Officers to consider adjustments to cost calculation which could be brought into effect in 2020-21.

10. RECYCLING CREDITS

- 10.1. Officers were asked to review the existing recycling credit scheme paid to Charities and the Charity Waste shop policy. Officers have prepared a report appended as Annex 2 of this report describes the position and concludes there is a strong case for engagement with borough officers on this issue and ceasing the scheme, with the potential to offer charities assistance in alternative ways. If Members are content, NLWA officers will liaise with borough opposite numbers, and engage with charities on the scheme to meet the Authority's future requirements. The outcome of that engagement and a recommendation will be presented to Members for a decision at the February Authority meeting on whether to continue offering credits in 2020-21.

11. DATA MANAGEMENT

- 11.1. NLWA officers are working in collaboration with the LEL management team to ensure the waste types being recorded at the weighbridge accurately reflect the materials which are being tipped by Boroughs.

- 11.2. Inaccurate data could result in Boroughs being charged for the incorrect waste type and to incorrect waste dataflow reporting for NLWA and individual authorities. More strategically it also affects the ability to design appropriate capacities into the new Resource Recovery Facility (RRF) and Geron Way facilities for specific waste types.
- 11.3. NLWA and LEL are working in partnership to produce guidance for Borough drivers on how to determine the correct waste type for each load and which identifies the required interaction between drivers and weighbridge clerks. Additionally, further considerations are being given to technical solutions to improve the confidence in information recorded, such as new intercom systems for drivers to speak to the weighbridge staff and tablet computers for LEL operatives to check and amend waste types in 'real time' before the vehicle exits the site.

12. EQUALITIES

- 12.1. Officers do not believe equalities will be impacted with the review of the WEEE kerbside service in section 8, however should there be a requirement for changes an Equalities Impact Assessment EQIA will be commissioned.
- 12.2. Following the review of the recycling credit scheme in section 10, should there be any changes in the service, the Authority will commission an EQIA.

13. COMMENTS OF THE LEGAL ADVISER

- 13.1. The Legal adviser has been consulted in the preparation of this report and comments have been incorporated in the report.

14. COMMENTS OF THE FINANCIAL ADVISER

- 14.1. The Financial Adviser has been consulted in the preparation of this report and comments have been incorporated

List of documents used:

WasteDataFlow - national web-based waste data system

Available at <http://www.wastedataflow.org/>

Our Waste, Our Resources: A Strategy for England, HM Government, 18 December 2018, Available at: <https://www.gov.uk/Government/publications/resources-and-waste-strategy-for-england>

Letsrecycle Website: -Trade website

Available at: www.letsrecycle.com

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Annex 1

WEEE (Waste Electrical and Electronic Equipment) Services update Briefing Note – December 2019

1. Introduction

'WEEE' is waste electrical and electronic equipment. It is end-of-life electrical and electronic equipment and covers virtually everything with a plug or battery.

The EC introduced the WEEE Directive in 2005 to address the environmental impacts of unwanted electrical and electronic equipment at end-of-life disposal and it is a 'producer responsibility' directive which means that producers are required to take financial responsibility for the environmental impact of the products that they place on the market, specifically when those products become waste.

Producers are required either to directly arrange their own WEEE recycling or to join a Producer Compliance Scheme (PCS); they can join separate PCSs for household and non-household WEEE or one PCS for both.

NLWA opted to join a PCS and awarded the current WEEE contract to European Recycling Platform (ERP) in October 2018. ERP are contracted to provide services from 1 January 2019 to 31 December 2020, with the option of extending to 31 December 2022 at the latest.

2. Principal features of the current contract

The current WEEE services contract is provided free of charge to the Authority as costs are met by producers. The option to take up the additional service providing kerbside collections of large WEEE for £80,000 per year was agreed by members as part of this contract. A summary of the services provided is as follows:

- WEEE material is collected from NLWA designated collection facilities (DCFs) (i.e. Reuse and Recycling Centres, certain bulky waste stores on estates and borough depots)
- WEEE materials are collected from 56 bring banks where the public can deposit equipment up to dimensions of approximately 50cmx50cm
- A kerbside collection service (optional) is provided by Clearabee. Under this arrangement, residents can phone to request larger WEEE items be collected from their home free of charge. Up to 20 appointments are offered each working day across the north London area.

3. Contract performance

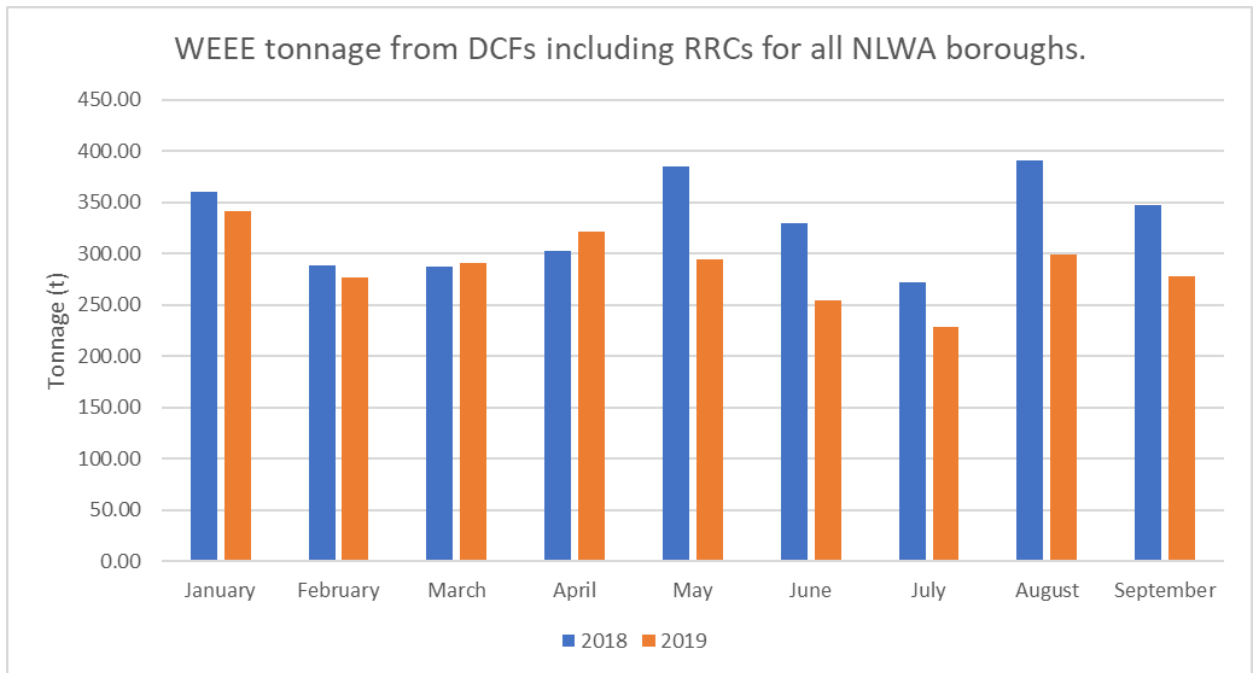
The total WEEE collected from the contract commencement date of 1 January 2019 to the end of September 2019 is 2,625 tonnes, compared with 3,026 tonnes for the same period in 2018. This reflects the national trend which has reported that WEEE has declined over the past two years. Some explanations for this include people hoarding more items and an increase in on-line resale of electrical items. See <https://www.isonomia.co.uk/where-do-weee-go-now-the-uks-declining-electrical-waste/>

DCFs

The quantity of WEEE collected from our DCFs (all eight RRCs in north London) and other 'designated collection facilities' (e.g. nominated bulky waste stores on estates; six in total), compared with the previous year can be seen in the graph below. The

WEEE collected through these facilities from January to September 2018 was 2,966 tonnes compared with 2,585 tonnes for the same period in 2019.

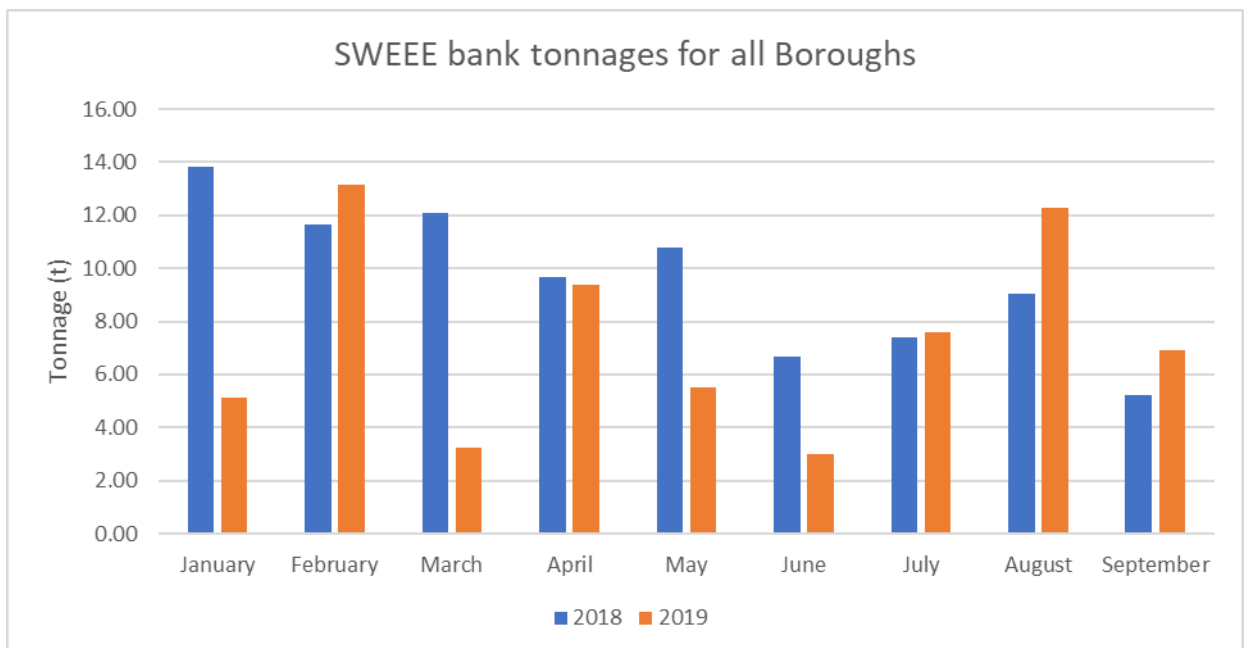
Figure 1: DCF tonnage comparison data Jan – Sept 2018 and 2019



On-Street banks for small WEEE

There are 59 on-street WEEE banks in 2019 compared with 66 in 2018. A few boroughs have rationalised their on-street facilities which has resulted in this reduction of sites as well of the removal of banks where there has been repeated vandalism or abuse. In 2018 (Jan-Sept) 86 tonnes of WEEE was managed through these banks compared with 66 tonnes in 2019 (Jan-Sept). The monthly performance of this service in 2018 compared with 2019 can be seen in figure 2 below.

Figure 2: Small WEEE on-street recycling banks tonnage comparison 2018 and 2019



Kerbside collections service

The kerbside service allows up to 20 collection appointments per day across the NLWA area and there has been an increase in use of this service during April – Sept 2019 compared with the same period in 2018. In tonnage terms this equates to 35.64 tonnes in 2019 compared with 35.74 tonnes in 2018.

This service has been actively promoted by NLWA with Borough specific tweets and on Borough websites which had a positive impact on the number of bookings. The booking rate is now between 75% and 95% of the potential reservations that can be made, which average 420 appointments per month. However, of the bookings, the number of non or partial collections average 41%. In this 41% of cases, the collection crew report that all or some of the items are not at the property – this may be because the waste has been taken by someone else or the resident fails to cancel a booking despite no longer wanting to use the service. The bookings data for this optional part of the contract are illustrated in figures 3 and 4 below.

Figure 3: WEEE kerbside collection bookings comparison April - September

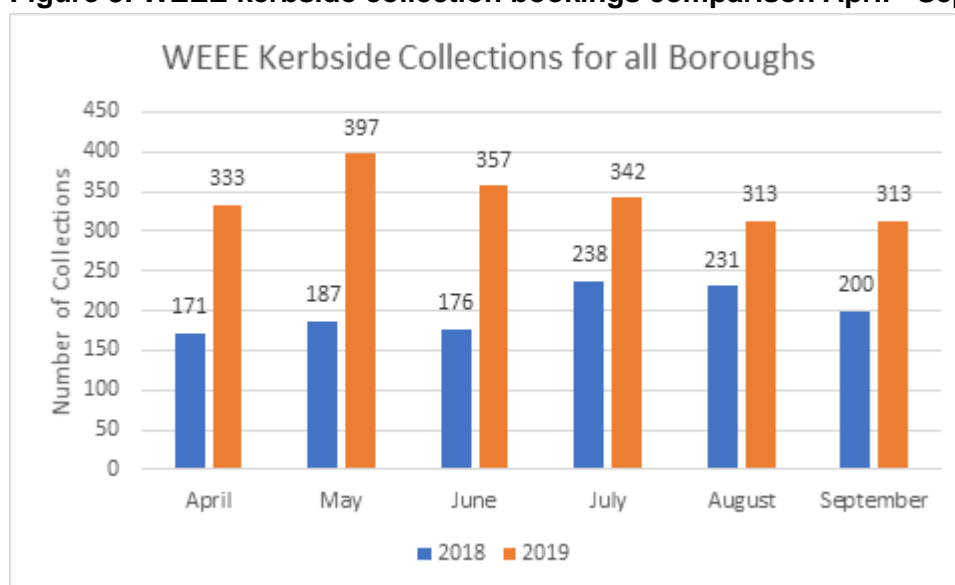
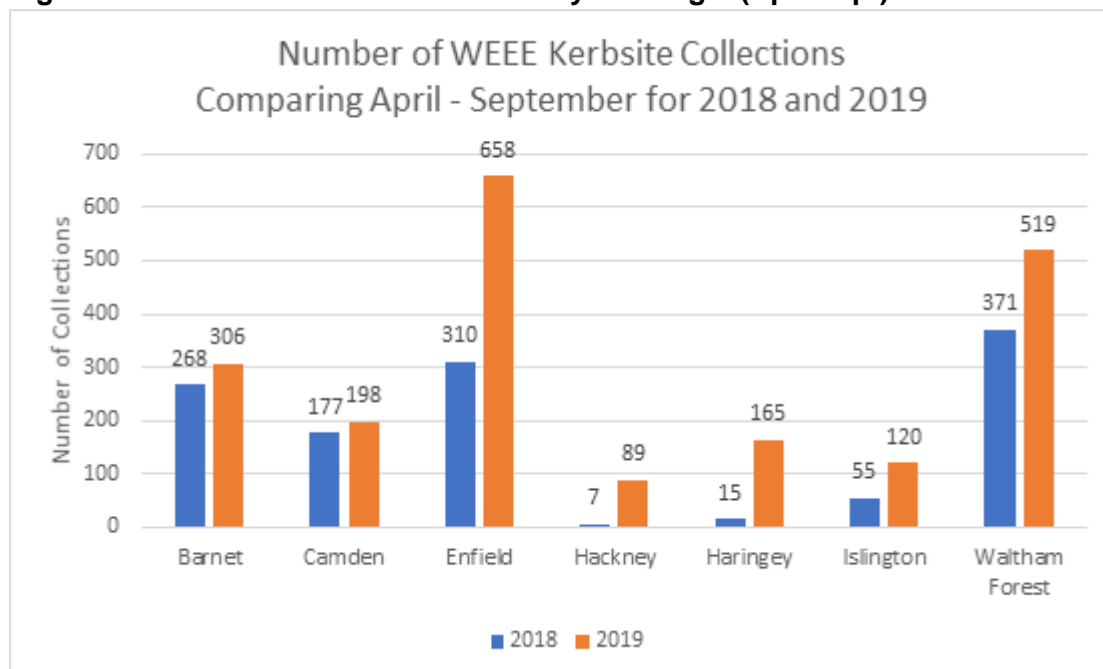


Figure 4: Total Kerbside collections by Borough (Apr–Sept) 2018 and 2019



Apart from the kerbside collections which costs £80,000 per year or £2,244.67 per tonne, the other WEEE services come at no cost to the Authority, other than Officer time spent in overseeing the management of the contract, dealing with day to day issues and collecting and compiling data, for borough and national reporting.

4. Borough WEEE services

As well as the contracted WEEE services provided by the Authority, Boroughs also have in place their own collection arrangements for bulky WEEE. This is a service which forms part of the bulky or special waste collections that Boroughs provide for items that are too large for the general household waste service. A summary of the Borough arrangements for WEEE can be seen in table 1. (Source: Borough websites)

Table 1: NLWA Borough arrangements for WEEE

Borough	Borough arrangements for large WEEE	Costs	Promotion of other WEEE collections or outlets
Barnet	Chargeable collection available on request	Minimum charge of £35	Clearabee, Summers Lane and local charities
Camden	Chargeable collection available on request	*Minimum charge of £10	Clearabee, Regis Rd and small WEEE kerbside service, WEEE banks
Enfield	Chargeable collection available on request	Minimum charge of £39.10	Clearabee and Barrowell Green
Hackney	Chargeable collection available on request	*Minimum charge of £15	Clearabee, RRCs, WEEE banks
Haringey	Chargeable collection available on request	Minimum charge of £25	Clearabee and RRCs
Islington	Chargeable collection available on request	*Minimum charge of £10	Clearabee, RRCs and Brightsparks
Waltham Forest	Chargeable collection available on request	*Minimum charge of £26	Clearabee, RRCs, WEEE banks

* Concessions available

5. Next steps / options

The WEEE contract is generally performing well but it should be noted that the kerbside service provided is expensive at £6,666 per month which the Authority has to pay whether the service has been used or not and if the actual collection of WEEE is successful.

6. Recommendations

The Clearabee kerbside collection has seen an increase in bookings which may be a result of efforts to raise awareness and promote the service. However, a disappointingly high proportion of bookings do not result in WEEE being collected. Officers recommend not to continue the service with Clearabee, instead to work with Boroughs to promote their additional services and also to work with charities such as Brightsparks. There is a case for continuing the service to end-March (subject to contractors' consent) to facilitate a smooth transition.

Annex 2

North London Waste Authority (NLWA) Reuse and Recycling Credit Scheme (RRCS) review

1. Background

The RRCS that NLWA currently operates has been in place since 2007. Recycling credit payments are made to third parties according to the amount of waste that is diverted from the Authority's waste stream. The value of third-party re-use and recycling credits is calculated using the method described in the Environmental Protection (Waste Recycling Payments) (England) Regulations 2006 which evaluates the avoided disposal costs. This does not include the costs of administering the scheme.

This year (2019/20), there are fifteen third party organisations registered with the Authority's RRCS which vary in size from national bodies such as Oxfam and Red Cross to small local groups such as Bright sparks / Digibridge and Barnet Furniture Centre. These groups estimate claiming 3,117 tonnes for the year, at a value of approximately £238,575. This cost is based on a recycling credit of £76.54 per tonne. This would equate to 0.49% of the total recycling rate in the North London Waste Authority area. The main material recycled is textiles for which the Charities receive an income of up to £400 per tonne from their own sales in addition to the recycling credit payment from NLWA. The Authority is essentially paying for the evidence that the materials are recycled.

For 2018-19 the costs of the scheme were £184,000 for 2,399 tonnes, contributing 0.38% of the recycling rate for the Authority area.

A breakdown of the material types collected by the charities and the amount paid in recycling credits in quarters 1 and 2, 2019/2020 (£76.54 per tonne) can be seen in table 1 below.

Table 1: Material type and quantities April – Sept 2019 *

Material	Percentage	Tonnes	Credit Payments
Textiles:	83.87%	1084.008	£82,969.98
Books:	9.94%	128.4336	£9,830.31
Furniture:	6.19%	79.98752	£6,122.24

*Data not validated

NLWA introduced Reuse and Recycling Credit Schemes by virtue of the powers under section 52 of the Environmental Protection Act 1990 (as amended by section 49 of the Clean Neighbourhoods and Environment Act 2005) to incentivise recycling and composting of household waste by waste collection authorities (WCAs) and by third parties.

Section 52 permits payment to be made of such amounts as may be determined in accordance with regulations made by the Secretary of State representing a net saving of expenditure on the disposal of the waste as the authority decides.

At that time, recycling credits were the only financial or regulatory incentive to reduce waste to landfill.

The NLWA RRCS policy supported the current North London Joint Waste Strategy implementation actions 4.C2 in relation to rewarding effective reuse services and 8.B1 to actively encourage community sector involvement in delivery of services wherever this can be demonstrated to offer Best Value.

However, the review of the scheme here in NLWA has been prompted by a recognition that there have been significant changes in waste management since the RRCS was first introduced and there are measures in place to promote more sustainable waste management outside of the RRCS. Partner authorities are increasingly supporting a wider range of reuse and recycling activities and at a time when additional obligations are being placed on them through National and partner-wide strategies.

The process for managing and administering the recycling credits which has been in place since the RRCS started is due to the concern that organisations could be benefitting from recycling credits when they are already receiving revenue for materials such as textiles and consequently there may not be a net saving of expenditure for the Authority. In this instance the credit could be directed to where it would support other materials with more recycling / reuse potential such as bulky waste.

This paper recognises the positive contribution and advances that individual groups and partner organisations have made to waste management since the launch of the RRCS and the increasing demands on the Authority.

2. Comparison with other London waste disposal /unitary authorities

To gauge its position concerning the use of RRCS compared with other Councils, the Authority spoke to London Borough and Waste Disposal Authorities as per table 1 below.

Most of these Authorities do not pay recycling credits although the majority do have arrangements in place to accept charity waste / recycling at their reuse and recycling centres (where they exist) in compliance with their site policies and procedures. A summary of the RRCS arrangements can be seen in table 2 below:

Table 2: Summary of WDAs and Unitary Authorities third-party credit payments (n/a= not available)

Authority	Pay recycling credits Y/N	Charity waste / recycling accepted at RRCs Y/N	Notes
Bexley (Unitary)	Y	Y	Credits are paid at a low rate of £26.53 which has remained unchanged for at least a decade.
Bromley (Unitary)	N	Y	
City of London (Unitary)	N	N	Authority does not have an RRC
Lewisham (Unitary)	Y	Y	Only one charity is registered for credits
Southwark (Unitary)	N	Y	
Sutton (SLWP)	N	N	
Tower Hamlets (Unitary)	N	Y	
Westminster (Unitary)	N	No	Authority does not have an RRC
ELWA (WDA)	N	Y	
WLWA (WDA)	N	Y	
WRWA (WDA)	N	Y	

Last year (2018/19) the recycling percentage attributed to the Boroughs from charity recycling is illustrated in the table below.

Table 3: Charity recycling rates by borough in 2018/19

	Q1	Q2	Q3	Q4	2018-19	HH WASTE	%
Barnet	158	130	160	153	600	140,316	0.43%
Camden	104	72	107	85	367	56,807	0.65%

Enfield	52	47	68	48	216	118,449	0.18%
Hackney	124	115	113	125	477	83,658	0.57%
Haringey	62	48	62	51	224	81,402	0.27%
Islington	46	49	50	46	192	55,539	0.35%
Waltham Forest	86	72	73	91	323	97,284	0.33%
					2,399	633,455	0.38%

3. Conclusion

The material on which recycling credits are paid is highly likely to be recycled in any case due to the value attached to the material. While the payment of recycling credits allows the Authority to score the tonnage as recycling, in practice it is far from clear that it leads to any change in outcomes. Moreover at £76.54 per tonne the payment is relatively high.

The Authority and LEL currently offer charities the opportunity to dispose of 5 tonnes of waste for free annually if they register with us, based on the existing Charity Waste Policy (see appendix 1). This has the advantage that it deals with waste which charities are unable to sell. While some of the waste will be considered for consultation is for unrecyclable waste, there will also be the opportunity to take any recyclable waste and gain the benefit from that. An option which could assist charities would be to increase the threshold to 10 tonnes, which will enable them to make direct savings in costs that they would otherwise face.

There are 140 charity shops in North London area. If all were to register and use a full 10 tonne allocation, the annual cost would be in the region of £125,000. There are currently 69 charities registered.

APPENDIX 1

Current Charity Shop Waste Policy

NLWA Policy and Procedures on Charity Shop Waste

January 2018

NLWA will accept waste from charity shops in the NLWA area. NLWA will monitor the frequency and amounts of waste that each charity shop delivers to NLWA in much the same way as it monitors householders delivering waste to ensure there is no abuse of the RRC service, and that NLWA only accepts household waste from charity shops under this policy.

NLWA has adopted the approach of LondonEnergy Ltd (LEL – formerly LondonWaste Ltd) for many years to the apparent satisfaction of local charities that has a limit of 5 tonnes p.a. in the first instance. The 5 tonne p.a. limit shall be applied to each charity shop rather than to each charity, so as not to penalise the larger charities that have multiple charity shops in the NLWA area. This limit will be reviewed in 2019/20.

The following additional measures apply for charity waste in the NLWA area from January 2018:

In 2018/19 charity shops may apply for registration at any time to deliver household waste from charity shops during 2018/19. For charities that wish to continue or start delivering such wastes in 2019/20 there will be an annual application/registration process. A deadline will be set in mid-December of one year for registration in the following financial year (subject to satisfactory quarterly charity declarations and NLWA audit visits as below); the deadline will be published on NLWA's website and notified to charities registered with NLWA at least four weeks before the deadline. All documents and information given to NLWA by the charity must be from an executive director or equivalent in order that NLWA can rely on them.

1. The charity must provide evidence (a) of its registration with the Charity Commission for England and Wales and (b) that their shop(s) are in the NLWA area. The charity must provide evidence of any necessary renewal during the relevant NLWA charity waste registration period.
2. The charity must provide evidence of its registration as a waste carrier with the Environment Agency, and must provide evidence of any necessary renewal during the relevant NLWA charity waste registration period.
3. The charity must ensure and warrant that all wastes delivered to NLWA have come directly from charity shops in the NLWA area.
4. The charity must declare in writing with its annual application for registration that it will make reasonable efforts to ensure that items delivered to NLWA will be only household wastes from a charity shop. Factors that would help NLWA to be satisfied of this would be confirmation in the application from the charity that it will keep records showing that the wastes will arise from donations made directly to the shop by residents; that the donating residents will have confirmed the items were all from their households; the wastes to be delivered to NLWA are items that the charity will have found to be unsuitable for sale in the charity shop; and that associated proceeds of sale (after deduction of expenses) from the relevant charity shop(s) will be applied for the charity shop's charitable cause. NLWA's expectations of the charity's records of its charity shop activities will be commensurate to the size of the charity.
5. The charity must declare in writing and for each quarter-year during which it has delivered waste to NLWA, firstly that it continues to meet the conditions of registration and secondly that it has made reasonable efforts to ensure that items delivered to NLWA were only household wastes from a charity shop. Factors that would help NLWA to be satisfied of this

would be records kept by the charity and made available to NLWA (on reasonable notice and at a location in the NLWA area) that demonstrate the wastes arose from donations made directly to the shop by residents; that the donating residents have confirmed the items were all from their households; the wastes delivered to NLWA were items the charity found to be unsuitable for sale in the charity shop; and that associated proceeds of sale (after deduction of expenses) from the relevant charity shop(s) were applied for the charity shop's charitable cause. NLWA's expectations of the charity's records of its charity shop activities will be commensurate to the size of the charity.

6. If the charity fails to make such a declaration within six weeks of the end of any quarter-year that it has delivered waste, or if NLWA asks to see relevant records and such records are either not made available on reasonable notice as requested or are not satisfactory in NLWA's reasonable opinion, NLWA reserves the right to charge the charity for some or all of the wastes the charity has delivered to NLWA and the charity accepts it will be liable to pay on demand NLWA's standard non-household waste charge and handling costs for wastes the charity has delivered in that quarter-year.
7. NLWA, directly or through its contractors, regularly inspects wastes being delivered to its RRCs and reserves the right for it or its contractors to refuse to accept wastes that it or its contractors reasonably believe not to be household wastes or not to have come from a charity shop, or if the charity shop fails to separate its wastes into different fractions as required at the RRC.
8. The charity can only deliver its household waste to the RRC(s) designated by NLWA (these will ordinarily be RRCs with weighbridges) during periods of time and on days of the week specified by NLWA. NLWA reserves the right to direct charities to other disposal points; this may require the driver of charities' vehicles to complete a health and safety induction and comply with all operational and relevant health and safety requirements.
9. There is five tonnes total limit per year for recycling and general waste per charity. NLWA will review this limit as above.
10. Deliveries to RRCs must be made in cars or vans with a gross weight less than 3.5 tonnes, or trailers no longer than four feet. In any case, any delivery in a van or a trailer over four feet in length must be booked at least one day in advance, and bookings will be subject to a maximum number of van/trailer deliveries per day and may require that the delivery takes place on a specific day of the week and/or within a specific time period on a specified day.
11. Deliveries to the other disposal points must be made in vans. NLWA may require that the delivery takes place on a specific day of the week and/or within a specific time period on a specified day.
12. The charity must pre-sort the waste into recyclable fractions as specified in advance by NLWA ready for deposit in appropriate recycling containers/places; no recyclable wastes can be placed in the residual/general waste containers/places. Each fraction (recyclable and non-recyclable) must be separately weighed at the RRC or other disposal point as specified in advance by NLWA.
13. NLWA reserves the right to make reasonable changes to these requirements at any time NLWA has reasonable grounds to believe the charity has delivered wastes for which NLWA was not liable to pay, or if there is a change in relevant

law. Any such change will be notified to relevant charities and will have effect as advised in the notice; if such changes arise from a change in relevant law and affect all registered charities they will be published on the NLWA website as well.

14. The charity cannot claim third party recycling credits from NLWA for any wastes that it has delivered to NLWA.